



October 31, 2024

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)
REQUEST TO EXTEND TIME FOR DEADLINES

Your Honor:

We represent the Plaintiffs in the above-referenced action. We write jointly with Defendants to ask for an extension of the upcoming deadlines. Plaintiff served Defendants with discovery requests on September 30, 2024, with their responses due November 1, 2024. Defendants' answer to Plaintiffs' Second Amended Complaint is due November 15, 2024. We expect to have at least 6 depositions to schedule and hold. I will be out of the country and unavailable from November 20-29, 2024. I will also be out on a medical leave December 19, 2024, through January 3, 2025, and am also unavailable February 17-21, 2025. The extension of time would also give the parties time to renew settlement discussions. This is the second request to extend deadlines.

<u>Event</u>	<u>Dkt. 16</u>	<u>Proposal</u>
Fact Discovery Deadline	12/4/24	3/21/25
Completion of All Discovery	12/4/24	3/21/25
Joint status Report	12/4/24	3/21/25
Dispositive Motions	12/18/24	4/11/25
Proposed Joint Pre-Trial Order	sine die/TBD	sine die/TBD

Thank you for your consideration of these matters.

Sincerely,

A handwritten signature in black ink that reads "Penn Dodson".

Penn Dodson, Esq.

penn@andersondodson.com